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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IAN WALLCE,)
)
Plaintiff,)
)
vs.) No. R4:18-cv-1859 PLC
)
PHARMA MEDICA RESEARCH,)
INC.,)
)
Defendants.)
)

DEPOSITION OF

HEATHER JORDAN, M.D.

Taken on behalf of Plaintiff

July 30, 2019

Reporter: Kimberly A. Harris, CSR

M A Y R E P O R T I N G S E R V I C E
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1 A. O'Fallon, Missouri.

2 Q. Where did you go to undergraduate?

3 A. So, UMKC is a six year combined program
4 where you do your undergraduate and your medical
5 school together in six years.

6 Q. Okay. Prior to working for Pharma Medica,
7 have you ever worked in a pharmaceutical testing
8 facility?

9 A. No.

10 Q. And when did you first start working for
11 Pharma Medica?

12 A. March of 2015.

13 Q. And when did you stop working there?

14 A. My last day was towards the end of May
15 this year.

16 Q. And why did you leave the employ of Pharma
17 Medica?

18 A. Pharma Medica closed their St. Louis
19 location.

20 Q. Okay. Did you leave on good terms?

21 A. Yes.

22 Q. Did you have a written contract when you
23 worked for Pharma Medica?

24 A. I had a letter of employment.

1 Q. And then did Mr. Yamlahi offer you a job
2 on the spot, or did you have to wait, or what
3 happened next?

4 A. I was offered the position by Latifa that
5 day.

6 Q. Okay. Let me ask you this, Dr. Jordan:
7 You are familiar with the Hippocratic Oath; right?

8 A. Yes.

9 Q. Tell me, in your own words, what is the
10 Hippocratic Oath?

11 A. That the needs of the patient come first,
12 and that you don't do things to harm the patient.
13 That's it's what the patient needs is primary.

14 Q. Okay. And you understand that your
15 relationship with Mr. Wallace was not governed by the
16 Hippocratic Oath because you were not a treating
17 physician; is that correct?

18 A. I was not his treating physician.

19 Q. Okay.

20 A. But as principal investigator, subject
21 safety is primary.

22 Q. Okay. So, you were governed by the
23 Hippocratic Oath or not?

24 A. I see the Hippocratic Oath as a physician

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1 And you see your signature on Page 2, Bates numbered
2 00169?

3 A. So, we would call this the study protocol.

4 Q. The protocol? Thank you. So, each of
5 those studies had a protocol that was provided by the
6 sponsor; correct?

7 A. The protocol was written, and approved by
8 the sponsor.

9 Q. Okay. And if you turn to Page 2, that's
10 your signature; correct?

11 A. Yes.

12 Q. And it says, "I am aware of the
13 information in this protocol, and agree to comply
14 with all of the procedures contained therein."
15 Correct?

16 A. Yes.

17 Q. Okay. What did you understand that to
18 mean when you signed that?

19 A. That means that I will see that the study
20 is conducted according to what is written in the
21 protocol.

22 Q. Okay. And the protocol governs terms such
23 as when blood is to be drawn; correct?

24 A. Yes.

1 Q. And it governs matters such as when the
2 participants are supposed to have meals; correct?

3 A. Yes.

4 Q. Does it govern procedures such as when the
5 participants are supposed to sleep, or does it vary
6 study to study?

7 A. There's not typically a specific time when
8 the protocol would tell a subject to sleep.

9 Q. Okay. Well, the study guidelines govern
10 everything ranging from when the medication is to be
11 administered to the time the blood is to be drawn and
12 tested; is that correct?

13 A. That's correct.

14 Q. Does the study guidelines determine how
15 the blood is to be drawn in terms of using a needle,
16 or using a catheter?

17 A. Yes.

18 Q. Okay. Does the study -- Strike that.

19 Do the study guidelines determine when the
20 participants are to be re-tested, if necessary?

21 A. Re-tested for what?

22 Q. For anything?

23 A. The protocol isn't going to necessarily
24 have a provision to re-test for anything. If there

1 is a safety concern, then as a principal
2 investigator, I'm able to order safety testing.

3 Q. Okay. And that would be in compliance
4 with the protocol; right?

5 A. Yes.

6 Q. Okay. So, basically the protocol
7 guidelines govern how the entire study is to be
8 conducted; correct?

9 A. Correct.

10 Q. Okay. It determines how the participants
11 are to be selected, as well; right?

12 A. Yes.

13 Q. And the pre-screening testing; right?

14 A. Yes.

15 Q. Okay. Do the study protocols determine
16 what records are to be kept?

17 A. So, the records are kept according to the
18 guideline of the regulatory authority.

19 Q. Okay.

20 A. Such as the F.D.A., or the E.M.A.

21 Q. Okay. And that's the only guideline for
22 recordkeeping that you're aware of?

23 A. I believe that's in the ICH, as well, as
24 far as duration of recordkeeping.